

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA (ALEXANDRIA DIVISION)**

BOOZ ALLEN HAMILTON HOLDING
CORPORATION,

Plaintiff,

v.

RAMEZ TANNOUS SHEHADI

and

WALID FAYAD,

Defendants.

Civil Action No.
1:19-cv-00869-CMH-JFAVAED

DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT

Pursuant to Fed. R. Civ. P. 12(b)(2), 12(b)(5), 12(b)(6) and Local Rule 7, Defendants hereby moves to dismiss the Complaint filed against it by Plaintiff in its entirety, with prejudice. Specifically, Plaintiff's Complaint should be dismissed because (1) the Court has no personal jurisdiction over Defendants because Defendants had no contact with Plaintiff in Virginia and insufficient minimum contacts with Virginia otherwise; (2) Plaintiff's breach of contract claim is barred as a matter of law since a court in the United Arab Emirates ("UAE") ruled that Defendants were terminated without "Cause;" and (3) Plaintiff insufficiently served Defendants with the Complaint. The grounds for this Motion are set forth more fully in the Memorandum in Support of Defendants' Motion to Dismiss Plaintiff's Complaint, filed concurrently with this Motion.

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Dated: this 5th day of July, 2019.

Respectfully submitted,

By: /s/ B. Patrice Clair

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 5th day of July, 2019, I caused the foregoing DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT to be electronically filed with the Court using the CM/ECF system and that I have caused a true and accurate copy of the foregoing DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT to be served, via email and first-class United States mail, postage prepaid, on the following:

Benjamin S. Boyd
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/s/ B. Patrice Clair

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